

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

SMITHGROUP, INC.,

Plaintiff,

v.

**PURE ARCHITECTURE AND
DEVELOPMENT, PLLC d/b/a Pure
Architects, and MARY FREE BED
REHABILITATION HOSPITAL, INC., a
Michigan corporation,**

Defendants.

Case No. 1:24-cv-00249-RJJ-RSK

Hon. Robert J. Jonker

JURY TRIAL DEMANDED

**PLAINTIFF SMITHGROUP INC.'S MOTION FOR
PRELIMINARY INJUNCTION**

Plaintiff, SmithGroup, Inc. (“SmithGroup”) moves this Court for a Preliminary Injunction against Defendants Pure Architecture and Development, PLLC d/b/a Pure Architects (“Pure Architects”) and Mary Free Bed Rehabilitation Hospital, Inc. (“Mary Free Bed”) (collectively “Defendants”) for the reasons set forth in the accompanying brief filed concurrently herewith.

SmithGroup requests that the Court grant SmithGroup’s Motion for Preliminary Injunction directing Defendants to cease and desist from any and all continued infringement of SmithGroup’s copyrighted architectural works, including but not limited to the copying,

distribution, and publication of SmithGroup's original works of authorship or derivative works thereof, and from the construction of any structures including SmithGroup's copyrighted subject matter.

WHEREFORE, SmithGroup respectfully requests that the Court GRANT this motion.

Date: March 22, 2024

BROOKS KUSHMAN P.C.

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CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on March 22, 2024, I electronically filed the foregoing document with the Clerk of the Court for the Western District of Michigan using the ECF System which will send notification to any registered participants of the ECF System as listed on the Court's Notice of Electronic Filing.

I also certify that on March 22, 2024, I electronically mailed the following counsel who has each represented to me (on the dates stated in the Certificate of Concurrence with L.R. 7.1, filed concurrently herewith) that they represent their respective parties.

<p>John G. Cameron Jr. DICKINSON-WRIGHT 200 Ottawa Ave., N.W. Suite 900 Grand Rapids, MI 49503-2427 Telephone: 616-336-1010 jcameron@dickinsonwright.com</p> <p><i>Attorneys for Defendant, Mary Free Bed Rehabilitation Hospital, Inc.</i></p>	<p>Christopher A. Cornwall DICKINSON-WRIGHT 500 Woodward Avenue Suite 4000 Detroit, MI 48226-3425 Telephone: 313-223-3530 ccornwall@dickinsonwright.com</p> <p><i>Attorneys for Defendant, Pure Architecture and Development, PLLC d/b/a Pure Architects</i></p>
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